

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar Number 7709

SKYLER H. PEARSON
Assistant United States Attorney
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
skyler.pearson@usdoj.gov

Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Doron Davidov,

Plaintiff,

V.

Alejandro Mayorkas, United States Secretary of Homeland Security; UR Mendoza Jaddou, Director of U.S. Citizenship and Immigration Services; Michael Valverde, Associate Director of Field Operations Directorate of U.S.C.I.S.; Lola K. Parocua, Las Vegas Field Office Director of U.S.C.I.S.; and J. L. Root, Adjudication Officer for Las Vegas Field Office of U.S.C.I.S..

Defendants.

Case No. 2:22-cv-00392-JCM-NJK

Stipulation to Extend Time to Answer or Otherwise Plead

(Third Request)

The parties, by and through their respective counsel, hereby stipulate and agree that the Federal Defendants' deadline to answer or otherwise plead in response to Plaintiff's complaint, currently due September 20, 2022, should be extended an additional 30 days until October 20, 2022. This stipulation is based on the following:

1. On March 2, 2022, Plaintiff filed his Complaint (ECF No. 1), requesting, among other things, that the Court “enter an order compelling the defendants to perform the duties owed to Plaintiff in connection with adjudicating his” I-485 application for adjustment of status (ECF No. 1 at 4).

1 2. The deadline for the Federal Defendants to answer or otherwise plead was
2 May 23, 2022.

3 3. On May 23, 2022, the parties stipulated to extending the time for Federal
4 Defendants to answer or otherwise plead until July 22, 2022 (ECF No. 6). The Court
5 granted the stipulation on May 24, 2022 (ECF No. 7).

6 4. On July 22, 2022, the parties again stipulated to extending the time for
7 Federal Defendants to answer or otherwise plead until September 20, 2022 (ECF No. 8).
8 The Court granted that stipulation (ECF No. 9).

9 5. Since the filing of Plaintiff's complaint and the previously granted
10 extensions, the United States Citizenship and Immigration Services ("USCIS") has issued a
11 notice of intent to deny Plaintiff's application. Plaintiff has responded by providing
12 additional evidence for the agency to consider. USCIS continues to review and evaluate the
13 evidence provided by Plaintiff.

14 6. Following review and evaluation of the evidence, USCIS can fully adjudicate
15 Plaintiff's I-485 application.

16 7. USCIS's adjudication of Plaintiff's I-485 application may result in resolution
17 of some or all of the issues raised in the complaint.

18 8. Accordingly, the parties stipulate and agree that the time for Federal
19 Defendants to answer or otherwise respond to Plaintiff's complaint should be extended
20 again to allow the parties to attempt to resolve this case without the Court's intervention.

21 9. If the parties are able to resolve this matter prior to the new deadline to
22 respond to Plaintiff's complaint, the parties will promptly file a stipulation of dismissal.

23 //

24 //

25 //

26 //

27 //

28 //

1 10. Otherwise, Federal Defendants will file an answer or other responsive pleading
2 on or before October 20, 2022.

3 Respectfully submitted this 19th day of September 2022.

4
5 LAW OFFICES OF ANTHONY D.
6 GUENTHER, ESQ.

7 /s/ Anthony D. Guenther
8 ANTHONY D. GUENTHER, ESQ
9 1900 S. Maryland Parkway
Las Vegas, Nevada 89104
Attorney for Plaintiff

JASON M. FRIERSON
United States Attorney

/s/ Skyler H. Pearson
SKYLER H. PEARSON
Assistant United States Attorney
Attorneys for the United States

10
11 **IT IS SO ORDERED:**

12 
13 **UNITED STATES MAGISTRATE JUDGE**

14
15 **DATED:** September 20 , 2022